

EXHIBIT 34

**To
PLAINTIFF'S LOCAL RULE 56.1(b)(3)(C) STATEMENT OF ADDITIONAL FACTS
REQUIRING DENIAL OF THE CITY'S MOTION FOR PARTIAL SUMMARY
JUDGMENT**

March 15, 2016

Case No. 14-CV-4391

THERE IS NO CENTRALIZED LOCATION FOR EVALUATION OF OFFICERS

“There are a lot of places you could find documents with an employee’s name on it.” [Deposition of 30(b)(6) Designee O’Neill at 25-26]

1.	Employment History and Assignments	CPD personnel files at Human Resources [O’Neill at 17-20, 23, 87];
2.	Records Of Training Provided By CPD	at the Training Academy , “but not accessible at the Department” [Id. at 21-22]
3.	Records Of Training Provided Outside CPD	in the Attendance & Assignment Sheets, in a warehouse at 39th & Michigan [Id. at 48-51]
4.	Open CR Investigations	at the Independent Police Review Authority [IPRA] [Id. at 27-28]
5.	Records of Discipline for Sustained CRs	at Internal Affairs [Id. at 21]
6.	Litigation Resulting in a CR	at Internal Affairs or at the Office of Legal Affairs [Id. at 20];
7.	Complimentary History	at Information Services [Id. at 93]
8.	Current Supervision And Evaluation	in a computerized performance evaluation system called CHRIS . [Id. at 22-23]
9.	Past (pre-CHRIS) Supervision And Evaluation	as handwritten performance cards kept at Human Resources [Id. at 22-23]
10.	Firearms Qualifications	at the Range [Id. at 25-26]
11.	Fitness Qualifications	at the Gym [Id. at 25-26]
12.	Court Notifications and Subpoenas	at the CPD Court Section [Id. 25-26]
13.	Polygraph Unit Personnel Files	at the Polygraph Unit [30(b)(6) Designee Hickey at X]
14.	Polygraph Unit A&A what is an A&A?	at the Polygraph Unit [Id. at X]
15.	Internal record that polygrapher has been sued	at Legal Affairs only , no record kept at Human Resources or the Polygraph Unit [Id. at 107-08]

SUPERVISORS ARE KEPT IN THE DARK ABOUT THEIR OWN OFFICERS’ MISCONDUCT

A supervisor would know about litigation against an officer he is supervising only if that supervisor initiated the CR, is assigned to investigate the complaint, or saw a notice from Legal Affairs that the officer was to report to pick up documents, a notice which communicates no substance about the nature of the litigation. [O’Neill at 118-120]

A sergeant generally did not know how many times one of his officers had been sued, but even if he knew, as long as the sergeant had no knowledge of the substance of litigation against the officer, that sergeant would have no obligation to initiate a complaint against the officer. [O’Neill at 122-123]